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1 2 3 4 5	Kevin L. Hernandez, Esq. Nevada Bar No. 12594 LAW OFFICE OF KEVIN L. HERNANDEZ 9555 S. Eastern Avenue, Suite 220A Las Vegas, Nevada 89123 T: (702) 563-4450 F: (702) 552-0408 kevin@kevinhernandezlaw.com		
6	Attorney for Plaintiff		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	AVIHOU MISHNIOT, an individual;	Case No.: 2:16-cv-01061-JAD-PAL	
10	Plaintiff,		
11	v.	STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO	
12	INTERNATIONAL RECOVERY GYGTEMG	FILE A RESPONSE TO DEFENDANT'S MOTION TO DISMISS FIRST	
13	INTERNATIONAL RECOVERY SYSTEMS, LTD doing business as NATIONAL	AMENDED COMPLAINT [ECF. No. 18] [First Request]	
14	RECOVERY SYSTEMS, a foreign corporation;	_	
15	Defendants.		
16	Plaintiff, Avihou Mishniot ("Mr. Mishniot"), and Defendant, International Recovery		
17	Systems, LTD doing business as National Recovery Systems, ("NRS") have agreed to extend the		
18	time for Mr. Mishniot to file an Response to NRS's Motion to Dismiss First Amended Complaint		
19	[ECF No. 18] to September 16, 2016. NRS filed its Motion to Dismiss First Amended		
20	Complaint [ECF No. 18] on August 18, 2016 and the current response deadline is September 4,		
21	2016;		
22	Mr. Mishniot requests this extension given the upcoming holiday and to permit the		
23	parties discuss possible resolution of this matter. This brief extension will allow the parties to		
24	further explore settlement options without expending unnecessary attorneys' fees and costs;		
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	1	This is the first request for an extension to respond to NRS's Motion to Dismiss First		
	2	Amended Complaint [ECF No. 18], and this request is made in good faith and not for the		
	3	purpose of delay.		
	4	Dated: September 1, 2016	Dated: September 1, 2016	
	5	FENNEMORE CRAIG, P.C.	LAW OFFICE OF KEVIN L. HERNANDEZ.	
	6	//D 1 M C 1		
Las Vegas, Nevada 89123 (702) 563-4450 FAX: (702) 552-0408	7 8	/s/ Douglas M. Cohen Douglas M. Cohen, Esq. (Bar No. 1214) Anthony Austin, Esq. (Bar No. 10850) 300 South Fourth Street, Suite 1400	/s/ Kevin L. Hernandez Kevin L. Hernandez, Esq. Nevada Bar No. 12594 9555 S. Eastern Avenue, Suite 220A	
	9	Las Vegas, Nevada 89101 Attorneys for Defendant	Las Vegas, Nevada 89123 Attorney for Plaintiff	
	10	Thomeys for Defendant		
	11			
	12	<u>ORDER</u>		
	13	IT IS SO ORDERED:		
	14	Todas		
	15		UNITED STATES DISTRICT JUDGE	
	16		Dated: September 2, 2016.	
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